

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Tamaro

K

Taylor

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

1:16-cv-04656

Judge Virginia M. Kendall

Magistrate Judge Sidney I. Schenkier

vs.

Case No: \_\_\_\_\_

(To be supplied by the Clerk of this Court)

Anita Alvarez / CITY OF CHICAGO

John B. Dillon

Rebecca Pinnix

OFFICER Dell

William Woelker

C.P.D.

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**RECEIVED**

APR 26 2016 *EW*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

Plaintiff

vs.

Defendants Continue

7. Kevin Docherty
8. Cook County
9. CITY OF CHICAGO

I. **Plaintiff(s):**

- A. Name: Jamaro K. Taylor
- B. List all aliases: N/A
- C. Prisoner identification number: #20140510095
- D. Place of present confinement: Cook County Jail
- E. Address: P.O. Box 089002 Chicago IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. **Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Anita Alvarez  
Title: States Attorney of IL  
Place of Employment: IL
- B. Defendant: John B. Dillon  
Title: Assistant States Attorney  
Place of Employment: IL
- C. Defendant: Rebecca Pinnix  
Title: Stripper  
Place of Employment: Unknown

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

*Defendants - Continue*  
D. Defendant: Dell

Title: Officer C.P.D.

Place of Employment: C.P.D.

E. Defendant: William Woelker

Title: Public Defender

Place of Employment: <sup>Cook</sup> County ~~Cook~~ Court house

F. Defendant: Chicago Police Department

Title: C.P.D.

Place of Employment: C.P.D.

G. Defendant: Kevin Docherty

Title: Detective

Place of Employment: C.P.D.

H. Defendant: Cook County

Title: County

Place of Employment: Self

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: 15c469 JAMARO TAYLOR V. Dr. Manella
- B. Approximate date of filing lawsuit: 1:15
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
- D. List all defendants: Dr. Manella  
 \_\_\_\_\_  
 \_\_\_\_\_
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District, Eastern Division
- F. Name of judge to whom case was assigned: Judge SARAH Ellis
- G. Basic claim made: deliberate indifference to a serious medical need
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): pending
- I. Approximate date of disposition: \_\_\_\_\_

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: 15 C 472
- B. Approximate date of filing lawsuit: 1.15.15
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_
- D. List all defendants: COOK COUNTY, THOMAS J. DART, CARBONE, MARIO REYES, MARTINEZ
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT, EASTERN DIVISION
- F. Name of judge to whom case was assigned: JUDGE SARAH ELLIS
- G. Basic claim made: CIVIL RIGHTS (PRISON CONDITIONS)
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: \_\_\_\_\_

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: 15 C 473
- B. Approximate date of filing lawsuit: 7.21.15
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_
- D. List all defendants: SUPERINTENDENT E. GREER,  
COMMANDER JOHN DOE, SGT JOHN DOE,  
OFFICER JOHN DOE
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT, EASTERN DIVISION
- F. Name of judge to whom case was assigned: JUDGE SARAH ELLIS
- G. Basic claim made: DELIBERATE INDIFFERENCE  
(FAILURE TO PROTECT)
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: \_\_\_\_\_

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: 15 C 476
- B. Approximate date of filing lawsuit: 2.6.15
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_
- D. List all defendants: THOMAS J. DART, MARIO REYES, COOK COUNTY, SUPERINTENDENT MARTINEZ
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT, EASTERN DIVISION
- F. Name of judge to whom case was assigned: JUDGE SARAH FULLS
- G. Basic claim made: BODY SCANNERS
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: \_\_\_\_\_

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



## IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Facts about my case (14CR10068) #1. The original arrest on 7/21/11, I was told by the States Attorney that they didn't believe the alleged victim. The official disposition of that arrest was SOL, in which I received from the Chicago Police Dept. in March of 2014 on the official arrest record myself. The Public Defender William Walkers in Court Rm. 604 where the Honorable Judge Leary Presides said that the arrest record that he sees from the Prosecutors Office show that they dismissed the charges in 2011. #2. I was also told by William Walker that "the DNA that they collected from me during the (July 2011) arrest they didn't run for a match until March 2014 in which they have a computer generated match."?? #3. The States Attorney's Office shared the computer generated results with the C.P.D., who then only sought an investigative alert "not a warrant" to arrest me. #4. At no time was there a warrant for my arrest for the alleged crime, not even until this day. #5. Police report reveals that the alleged victim Bebecca Pinnix said that the alleged incident happened on 8-20-11 and that she called the Police but they didn't come. States Attorney said there is no record of the call stated by Kremin. #6. Why has it been a 3 year delay in running the DNA? #7. The rape kit reveals no force, entry, no hair, no skin or fibers from the accused. #8. The rape kit contradicts the alleged victim's claims. #9. The alleged victim claim isn't consistent with the facts. She didn't go to report the alleged incident until the following day, at which this statement changed twice in her interview with States Attorney Kremin.

#9. The C.P.D. didn't seek an arrest until 7-21-11 when alleged victim said the incident happen on 5-20-11. #10. Re-arrested for the same charges on 5-8-14 and not indicted until 6-10-14 which is a violation of my due process rights. #11. On 6-5-14 I was indicted I was told at my 3rd preliminary hearing in 2014. #12. The arrest in 2011 where I was never brought to a preliminary hearing or indicted "violation of due process". #13. The C.P.D. arrested me in Calumet City, IL. on 159<sup>th</sup> Street. #14. The C.P.D. told several acquaintances of mine that there was a warrant issued for me. #15. C.P.D. searched people's homes for me without showing a warrant or one being actually issued. #16. My Public Defender told me the States Attorney's Office and C.P.D. has no idea where the alleged victim is to this date. #17. On 5-8-14 I was told by the C.P.D. that an investigative alert was issued for me and that's why I was being arrested by "Officer Dell" who left cards with acquaintances, but "Investigative alerts" are illegal because there are no constitutional safeguards. #18. At the C.P.D. the Captain told me that the results from the DNA test was inconclusive and that I needed to take another one, but then said it was a (1 in 15 billion match) and that they contacted the alleged victim and she wanted to press charges. #19. There is no mention written that the alleged victim contacted the C.P.D. to follow up on these charges from 2011 to the present. #20. My DNA was taken 7-23-11 but was not submitted until 8-24-11 and the results were not returned until March 2014. My Public Defender William Wolkers informed me of this on 7-23-11. #21. Rape kit results usually come back within 4-6 hours which would have been on 5-21-11, the results were inconclusive, and so police had me take a swab on 7-23-11. #22. DNA inconclusive no probable cause, no warrant but arrested 2 months after alleged incident. #23. My Public Defender also told me and I quote "we did not seek an indictment for you on

"6-10-14" 32 days after my second arrest, when I mentioned to the Public Defender William Woelker  
 about my right to "Due Process" being violated he said they're within their rights! <sup>#25</sup> Every  
 issue that I have with this malicious prosecution my Public Defender tells me they can do this and  
 their within their rights. <sup>#26</sup> The Prosecution is delayed intentionally as a tactical advantage.  
 This is a 3 year old case and still they keep asking for continuations to complete the "discovery"  
 which is outstanding at this point. <sup>#27</sup> On June 5, 20-14 a letter was printed by John B. Dillon  
 Assistant State's Attorney with the knowledge of Anita Alvarez, State's Attorney of Cook  
 County, wherefore this letter states that I was indicted on June 5, 2014, which is a complete  
 fabrication due to the nature of the original date of the indictment June 10, 2014. In which  
 Paper Shuffling, Manipulating the system and malicious Prosecution has been deemed unconstitutional. <sup>#28</sup>  
 I've asked my Attorney William Woelker for the charging instruments, Grand Jury  
 Transcripts, Police report and chain of custody? He gave me a copy of half of the supplemental  
 report (3 pgs out of 6) without the police report and the charging doc's without addressing  
 the chain of custody and mailed me a letter stating his supervisor told him he is only allowed  
 to give me the charging doc's and not the grand jury transcripts. "Punitive Damages" <sup>#1</sup> Loss  
 of barber shop due to arrest in (2012). <sup>#2</sup> Forced to file Chapter 7 and then Chapter 13 in 2011 &  
 2012. <sup>#3</sup> Loss of several vehicles. <sup>#4</sup> 2 different evictions (2011-2013). <sup>#5</sup> Denied Employment  
 at Grand Gulf Nuclear Station. <sup>#6</sup> Also D.C. Cook Nuclear plant in 2011 & 2012 with \$700/wk. pay  
 (10 month assignment 42 wks. X \$2,200 at Grand Gulf) & (\$300/wk X 9 wks. at D.C. Cook). <sup>#7</sup> Loss  
 of 2 vehicles in 2014. <sup>#8</sup> Failure of freight brokerage (Muriel Marguerite Thomas) in 2014. <sup>#9</sup> Bank  
 accounts closed. <sup>#10</sup> Quality of Life reduced for me & my family drastically. All have contributed in  
 in the "Defamation of My Character". I have lost everything & Made out to be a rapist in which

has destroyed my reputation amongst my family, friends, acquaintances, customers & my community & society. All that are mentioned are being sued in their own Corporate, Official & Individual Capacity, For the aiding & assisting fraudulently & maliciously the State of Illinois in which is Deliberate. All Involved have Violated my Constitutional Rights. Also Detective Docherty 20873 StB<sup>th</sup> contacted Rebecca Pinnix July 21st, 2011 for a follow up interview in this sexual assault investigation in which Pinnix stated that she believed that I was inside L & M Barber Shop located at 422 East 87<sup>th</sup> Street but of course I was there due to it being a place of business in which I'd given her my card when we first met. Pinnix took 2 months to give Detectives my known location that she had knowledge of 2 months prior. Det. Docherty never went to the alleged crime scene & I don't understand why it took him 2 months to investigate or arrest. Everything involved with this case from beginning until present has been fabricated by all parties. My Constitutional Rights have been violated once again along with my 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup> & 14<sup>th</sup> amendment rights. IF I'm not brought to trial by 9-3-14, my right to a speedy trial will have also been violated. The chain of Command & Protocol has failed them all in this fabricated case by the Plaintiff. Officer Dell the arresting officer on May 8<sup>th</sup>, 2014 stated that I was being arrested due to an investigative alert. I asked was this a warrant he stated just like a warrant. He was also out of his jurisdiction in which he wore & others on U.S. Marshall's Vest & once I was arrested & placed in custody they all pulled off the U.S. Marshall's Jacket & Vest. In total violation of the Law & It's Protocol. Also Ineffective Assistance of Counsel Displayed by My Public Defender William Norlker who also knowingly withheld valuable information pertaining to my case & violating my constitutional rights amongst others named Cook County is also liable for it's Employee's wrongdoing in this malicious attack on me & my family along with False Imprisonment.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Due to Malicious Prosecution, Deliberate Indifference, Defamation of Character, Ineffective Assistance of Counsel, Violation of my Constitutional Rights & Amendments & False Imprisonment along with the loss of Everything that I've ever owned. I ask the courts to rule in my Favor in the amount of \$20,000,000.00 & That All be sued in their own Corporate, Official & Individual Capacity & Award Monetary Relief For Pain & Suffering, Mental Anguish & Distress Etc. In this Relief.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 7<sup>th</sup> day of Oct., 20 14

X [Signature]  
(Signature of plaintiff or plaintiffs)

Jamarc Taylor  
(Print name)

20140510095  
(I.D. Number)

P.O. Box 089002

Chicago IL 60608  
(Address)